

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	4:14CR00187 JAR (DDN)
v.)	
)	
PAMELA TABATT et. al. ,)	
)	
Defendants.)	

**DEFENDANTS' JOINT MOTION FOR EXTENSION OF TIME
TO FILE MOTION TO DISMISS INDICTMENT**

COME NOW Defendants, by and through their respective undersigned counsel, and hereby move for the Court to grant them a sixty day extension of time, to and including Tuesday, September 1, 2015, in which to file any Motion to Dismiss the indictment. In support of their motion, Defendants state as follows:

1. There is currently a deadline set of July 1, 2015 for any motion to dismiss to be filed in this matter. The Court previously granted a request to extend the deadline from June 1, 2015 to July 1, 2015. *See* Doc. 127.
2. Counsel for Defendants filed an Ex Parte request for expert services for the purpose of consultation necessary to provide adequate representation in this matter through pre-trial motions, including a Motion to Dismiss, which is still pending. *See* Doc. 125.
3. Assuming that Defendants' request for expert services is granted by this Court, Defendants will require additional time to retain and consult with experts in order to properly prepare any Motion to Dismiss.
4. In addition, at various status conferences held in this case and the related cases, the Court related its understanding that defendants may wish to consider any plea proposals in order to inform their decision as to whether to proceed to file any motion to dismiss.

5. Plea proposals were received by each of the Defendants on June 15, 2015 and counsel for defendants will require additional time to consider the plea proposals in order to determine whether or not to proceed with the filing of a Motion to Dismiss.

6. Defendants therefore respectfully request that the Court enter its Order granting additional time, to and including September 1, 2015, in which they may file any motion to dismiss.

WHEREFORE, for the foregoing reasons, Defendants jointly request that the Court grant their motion for a sixty-day extension of time to and including September 1, 2015, in which to file any motion to dismiss and grant all such other and further relief this Court finds just and warranted under the circumstances.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

Signature of the foregoing document is also certification that a true and correct copy has been filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following on this 25th day of June, 2015 to:

James Delworth
Jennifer Winfield
Erin Granger
Assistant United States Attorneys
111 S. 10th Street
St. Louis, Missouri 63102

/s/J. Christian Goeke

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Attorney for Defendant